

EXHIBIT E

[45]

CONSUMER ENFORCEMENT ACTION
CONSENT ORDER & JUDGMENT

Served by US First Class Mail
Certified, Express Mail Return Receipt

BWW Law Group LLC.
6003 Executive Blvd. Ste. 101
Rockville, MD 20852

August 8, 2015

Select Portfolio Servicing Inc.
PO Box 65250
Salt Lake City, UT 84165
3815 South West Temple
Salt Lake City, UT 84115

Wells Fargo Bank, National Association,
Trustee f/b/o Holders Structured Asset
Mortgage Investments II Inc. Bear Stearns Mortgage
Trust Funding Trust 2006-AR4

Re: [Loan Number] # [0015233554]
Cameron Jefferson
11509 Brigit Court
Bowie, MD 20720

Legal Department;

I am responding to a dunning letter received by this office dated July 22, 2015. Prior to addressing the particulars of this debt collection notice, you are hereby noticed that your notice lacks merit.

Firstly, BWW is a debt collector as defined by 15 USC§1692a (6) and is attempting to collect an alleged debt pursuant to §1692a (5). I am a consumer as defined in §1692a (3) and your office, nor Select Portfolio Servicing is a creditor pursuant to §1692a (4).

Your claim that SPS is a loan and or mortgage servicer is denied and no evidence is available to support this statement. Furthermore your hearsay claims from SPS regarding a consumer transaction resulting a Deed of Trust and Promissory Note executed on October 26, 2006 is denied.¹

Your letter appears to allege you have been retained by the debt collector SPS to provide legal services in enforcement of the Deed of Trust. However there are at least two issues regarding that position your office should consider. First, there is no Deed of Trust and Promissory Note at issue in this matter. To the extent you are referring to some alleged consumer transaction that may have taken place with Bear Sterns Residential Mortgage Corporation. It would be absolutely impossible for you and or SPS to represent any part of that alleged transaction.

¹ See, US Supreme Court Decision in *Jesinoski et ux. v. Countrywide Home Loans, Inc., et al*, No.13-684, (Decided January 13, 2015)

Served by US First Class Mail
Certified, Express Mail Return Receipt

Accordingly, a possible transaction with Bear Stearns was Rescinded and Cancelled in August 2008, (see, 15 USC §1635, 12 CFR §226.15) therefore neither if you could be attempting to enforce a transaction that does not exist. Additionally, the named entities in Wells Fargo Bank as Trustee for Structured Assets Mortgage Investments II, Mortgage Funding Trust 2006-AR4.....is an unknown REMIC, MBS which could never be a creditor of mine.

That named Trust entity does not exist, and neither SPS, neither BWW represents the unregistered trust/entity. It is my belief you and SPS are relying upon the bogus Assignment of an alleged fabricated on March 17, 2015 and executed on March 24, 2015. This Assignment SPS and or your firm recorded lacks merit and is a misrepresentation and deceptive practice in violation of the FDCPA and Maryland Consumer Protection Act, Title 13, Section §13-301.

The assignment is an attempt to deceive me the consumer and also a defamation of my title records by a third party "debt collector", at best and even that capacity is unproven. Both you BWW and SPS claims that an alleged debt is owed of \$843,706.78 is equally frivolous and lack merit. Consequently, this dunning letter and alleged amount is not conclusive and fails to comply with my request pursuant to federal and state consumer protection laws.

Accordingly, "BWW" shares the exact same capacity as your client SPS, which is a "debt collector" pursuant to the FDCPA, Maryland Consumer Protection Act and Truth in Lending Act respectively. I am respectfully warning all parties that any attempt to collect, enforce and or advance any litigation relying on any of the information contained will result in suit being filed against BWW and SPS collectively. Being that BWW has included itself in this debt collection matter, BWW is not being served notice in its corporate capacity to provide Validation and Verification of the alleged debt (claims) pursuant to 15 USC §1692g (1)(2) and Maryland Consumer Protection Act, Title 13, Section §13-301.

Specifically, I require legal Validation and Verification, from the alleged Creditor and not any third party debt collector relying upon hearsay and unreliable fabricated documentation. Additionally your alleged debt and amounts due and owing are disputed as a Billing Error pursuant to Regulation Z, 12 CFR §226.13 (b). You are to comply with the requirements appropriate to fulfil that request.

In concluding, BWW is hereby noticed that the entire content of this notice apply to it and you must comply with by responding timely and fully. A copy of this Notice with also be served upon SPS and the above named REMIC, MBS whom you claim is a creditor. Be advised that a failure to respond may result in additional actions being taken which include, but not limited to a suit filed against you, BWW. Also to the extent you file any creditor related action masquerading as a foreclosure and or Mortgagee, the results will be the same. Lastly, even if by chance there was some legitimate debt the Statute of Limitations on collection of that debt through any legal means has tolled.

Dated: August 8, 2015

Served by US First Class Mail
Certified, Express Mail Return Receipt

By: /s/ Cameron Jefferson

cc: file
cc: CFPB
cc: counsel

BWW LAW GROUP, LLC
ATTORNEYS AND COUNSELORS AT LAW
6003 EXECUTIVE BOULEVARD, SUITE 101
ROCKVILLE, MARYLAND 20852
(301) 961-6555
FAX (301) 961-6545

From the Desk of: Jacob Geesing, Esq.

jake.geesing@bww-law.com
(301) 469-3354 (Direct Line)

THIS COMMUNICATION IS FROM A DEBT COLLECTOR

August 12, 2015

VERIFICATION OF DEBT

Cameron Jefferson
11509 Brigit Ct
Bowie, MD 20720

Re: BWW File # 69121 / Secured Property: 11509 Brigit Ct, Bowie, MD 20720
Deed of Trust Dated: 10/26/2006 / Original Principal Balance: \$546,400
Borrower / Grantor: Cameron Jefferson

Mr. Jefferson:

This firm has been hired by Select Portfolio Servicing, Inc. ("SPS") to exercise the power of sale contained in the above referenced deed of trust if the default claimed there under by SPS is not resolved. This is in response to your letter of August 3, 2015.

A copy of the promissory note you executed is enclosed. The Deed of Trust granted to secure repayment of the debt evidenced by the Note is recorded in the land records of Prince George's County in Book 27109, page 697. An image of the recorded deed of trust can be viewed at <https://mdlandrec.net>. As you know, the original lender was Bear Stearns Residential Mortgage Corporation, 640 Freedom Business Center Drive, Suite 600, King of Prussia, PA 19406. The loan is now owned by Wells Fargo Bank, National Association, as Trustee f/b/o holders of Structured Asset Mortgage Investments II Inc., Bear Stearns Mortgage Funding Trust 2006-AR4, Mortgage Pass-Through Certificates, Series 2006-AR4, and serviced by SPS.

According to the business records of SPS provided to this firm, the loan has an unpaid principal balance of \$587,937.22 and is due for the April 1, 2009 payment. If you would like up to date payoff or reinstatement figures, or wish to discuss any other foreclosure prevention options, please contact SPS directly at 888-349-8955.

Sincerely,

BWW LAW GROUP, LLC



Jacob Geesing

Enclosure